



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

**DEC 28 2015**

Ms. Cindy Blady  
Chief, Rules, Announcements and Directives Branch (RADB)  
Division of Administrative Services  
Office of Administration  
Mail Stop 3WFN-06-A44MP  
U.S. Nuclear Regulatory Commission  
Washington, DC 2055-0001

RE: Final Environmental Impact Statement for an Early Site Permit at the PSEG Site

Dear Ms. Blady:

The U.S. Environmental Protection Agency (EPA) has reviewed the Nuclear Regulatory Commission's (NRC) Final Environmental Impact Statement for an Early Site Permit (ESP) at the PSEG Site located adjacent to the existing Hope Creek Generating Station and Salem Generating Station in Lower Alloways Creek Township, Salem County, New Jersey (CEQ # 20150329). This review was conducted in accordance with Section 309 of the Clean Air Act and with the National Environmental Policy Act (NEPA).

The ESP is a NRC approval of a site or location for one or more nuclear power facilities. If approved, the site would be "banked" for up to 20 years, during which time a reactor type would be chosen, and a construction and operating license application submitted to the NRC. So, while the applicant, PSEG Nuclear, has not chosen a reactor type at this time, as part of the ESP the NRC must examine the impacts of both building and operating the hypothetical nuclear reactor(s) and associated facilities at the PSEG site. The design for such a hypothetical new plant was based upon nuclear reactor and power plant designs identified by the applicant in a plant parameter envelope. PSEG has also stated that an additional access road would be constructed to address future transportation and safety needs for the entire PSEG Site. This new three-lane causeway would be constructed on elevated structures for a 5-mile length through coastal wetlands.

The Final EIS is thorough in its analysis of environmental impacts. However, EPA is still concerned that the EIS provides insufficient information for us to make a reasonable judgment as to whether the proposed discharge will comply with the Clean Water Act Section 404(b)(1) guidelines. Approximately 134 acres of wetlands would be permanently impacted for the construction of the power block area, cooling tower area, the switch yard, and causeway. For the purposes of this ESP application, the NRC is using a plant perimeter envelope (PPE) approach that includes plant design parameters derived from four different certified reactor

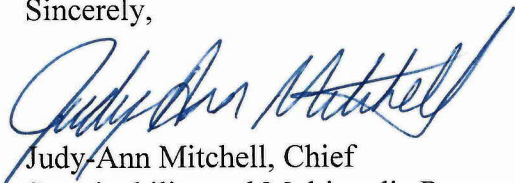
technologies in order to determine a conservative estimate of impacts, particularly to wetlands. Although the applicant would not be required to use any of these designs if it elected to proceed with a combined license application, it would be required to address whether the characteristics of the reactor ultimately selected fits within the values of the design parameters specified in the ESP. Based on the PPE evaluated in the EIS, the applicant proposes to permanently impact 131 acres, and temporarily impact 81.8.4 acres, of waters of the United States for the construction of a reactor, cooling tower, switchyard, batch plant, heavy haul road, construction parking, and laydown area.

EPA does acknowledge that some of the 404(b)(1) guidelines have been addressed, such as alternative sites, and that a mitigation plan is under development with the Corps of Engineers, but without a final design, we are concerned that the FEIS does not provide sufficient information for us to make a reasonable judgment as to whether the proposed discharge will comply with the Clean Water Act Section 404(b)(1) guidelines. Without this information, we cannot determine if the wetlands impacts associated with construction have been minimized to the greatest extent practicable. EPA will continue to work with the Army Corps of Engineers on the Clean Water Act permit.

EPA would also like to remind the applicant and NRC to be aware of the changes in sea level and storms predicted for the future in this area. Any new reactor or waste fuel storage areas on the site should be built with future safety concerns in mind.

If you have any questions regarding this review or our comments, please contact Lingard Knutson of my staff at (212) 637-3747.

Sincerely,

A handwritten signature in blue ink, appearing to read "Judy Ann Mitchell", is written over a horizontal line.

Judy Ann Mitchell, Chief  
Sustainability and Multimedia Programs Branch